

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TONY KOLE, individually and as President
and Manager of Ghost Industries, LLC, and
GHOST INDUSTRIES, LLC, an Illinois
limited liability company,

Plaintiffs,

v.

VILLAGE OF NORRIDGE, an Illinois
municipal corporation, RONALD A.
OPPEDISANO, individually and as President
of the Village of Norridge, JAMES J. JOBE,
Chief of Police of the Village of Norridge,
JUDITH D. BERNARDI, Clerk of Village
of Norridge, URSULA A. KUCHARSKI,
DENNIS H. STEFANOWICZ, DOMINIC
SULIMOWSKI, DOMINIC S. FALAGARIO,
JACQUELINE GREGORIO, AND ROBERT
MARTWICK, individually and as Trustees
Of the Village of Norridge and MARK V.
CHESTER, individually and as Village
Attorney of the Village of Norridge,

Defendants.

Civil Case No: 1:11-cv-03871

Hon. Charles R. Norgle, Sr.
U.S. District Judge

Hon. Morton Denlow
U.S. Magistrate Judge

PLAINTIFFS' RESPONSE TO DEFENDANTS'
MOTION TO DISMISS AMENDED COMPLAINT

NOW COME Plaintiffs, TONY KOLE and GHOST INDUSTRIES, LLC, by their attorney, Walter P. Maksym, Jr., and submit the following Response to Defendants' Motion to Dismiss Amended Complaint (Doc. 15) and Memorandum in Support (Doc. 15.1), and state:

1. Plaintiffs admit that they have filed an eighteen-count Amended Complaint. However, Defendants mischaracterizes it as merely challenges their "licensing and regulation of Plaintiffs' weapons sales business within the Village of Norridge" is oversimplified, as will be discussed in Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Dismiss Amended

Complaint filed herewith.

WHEREFORE Plaintiffs respectfully pray that, for the reasons set forth in Plaintiffs' Memorandum, this Court should enter an order find that the Amended Complaint states claims upon which relief could be granted, deny Defendants' Motion to Dismiss it, and grant such other further relief as may be fair, just and proper in the premises.

Respectfully submitted,

TONY KOLE and GHOST INDUSTRIES, LLC, Plaintiffs,

By /s/ Walter P. Maksym, Jr.

Walter P. Maksym, Jr., their attorney

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